



London Borough of Hammersmith & Fulham

Statement of Consultation - Climate Change SPD

(October 2023)

1. Introduction

- 1.1 This Consultation Statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. This statement sets out details of the consultation undertaken on the review of the council's draft Climate Change Supplementary Planning Document (SPD). It sets out the details of the consultation and includes a summary of the main issues raised by those that responded and how these have been addressed.
- 1.2 The Climate Change SPD provides supplementary detail to policies concerned with Climate Change topics within the council's new Local Plan.
- 1.3 In accordance with the Regulations, the draft SPD was subject to a 7-week consultation with key stakeholders, developers and local residents. This took place from 20th April to 8th June 2023.
- 1.4 The Climate Change SPD is also supported by an Equality Impact Assessment carried out in accordance with the Equality Act 2010. In addition, the council considered the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, specifically Schedule 1 (the criteria for determining the likely significance of the effects on the environment). Officers came to the conclusion that an SEA was not required. This assessment was sent to key environmental stakeholders including Historic England, Natural England and the Environment Agency who raised no objections through the consultation to the council's view that the SPD was not likely to have significant environmental effects.
- 1.5 The purpose of the SPD is to provide supplementary guidance to the planning policies contained in the council's Local Plan that relate to climate change and to help implement the actions contained in the council's climate change strategy. This includes topics encompassing (but not limited to) sustainable design and construction, air quality, flooding, energy, ecology, waste, and transport and travel.
- 1.6 The guidance in the SPD applies to new build homes, extensions and retrofitting of homes, non-domestic and mixed-use developments. The SPD is intended for use by developers, landowners, homeowners, planning officers, and other interested parties when preparing and assessing planning applications. The SPD should improve implementation and delivery of policy objectives which reflect the Council's ambitions for climate mitigation and adaptation.

2. Consultation Undertaken

- 2.1 When undertaking consultation on the Climate Change SPD, the council followed the processes outlined in its Statement of Community Involvement which was adopted in November 2015.
- 2.2 Public consultation on the draft SPD ran for 7 weeks until 8th June 2023. The document was made available on our website and on our 'Have your say' consultation portal. In addition, we promoted participation in the consultation on our digital channels, the weekly e-newsletter as well as on the 'Nextdoor' engagement platform emphasising this is part of H&F's net zero carbon ambition. The SPD was made available at the borough reference libraries and on the Council's website, as set out in the Council's Statement of Community Involvement. Additional targeted consultation was carried out, including publicity via the Council's Twitter account. The Council wrote to specific consultation bodies outlined in the Regulations and to general consultation bodies, such as amenity groups, resident associations, businesses and others.
- 2.4 Following the consultation on the draft Climate Change SPD, a number of amendments have been made in response to the representations received. This Statement of Consultation provides a summary of the responses received to each topic area and how the council have addressed these comments. A full schedule of the representations received and officer responses as well as a revised version of the Climate Change SPD can be found on the council's website at: www.lbhf.gov.uk/localplan

3. Summary of Responses

- 3.1 In total, 93 representations were received from 20 organisations/individuals to a variety of topics within the SPD.
- 3.2 A full schedule of the representations received including officer responses can be found on the council's website. This shows how officers have addressed each comment received and outlines the changes which have been proposed.
- 3.3 A summary of the representations received to each topic area of the SPD can be found below.

General Comments

General comments included those related to Climate change matters more generally. 21 comments were received, from the following individuals/organisations:

- Dianne Murray
- Richard Jackson
- TTL Properties Ltd
- TFL
- Alison Hancock
- John Rowles
- Historic England
- The Woodland Trust
- Michael Pritchett
- Telereal Trillium
- Old Oak Development Corporation
- Ealing Front Gardens project
- Swifts Local Network
- Sonia Falconieri
- Marine Management Organisation
- Natural England
- Earls Court Development Corporation

Six residents made general comments on the SPD. Five of them welcomed the SPD but felt it could do more particularly in relation to retrofitting properties in the borough. Some felt there should be further signposting and references to other climate change related practise elsewhere. One resident criticised the SPD stating that the council and existing buildings should do more, and the emphasis should not be on developers and new build developments. These comments were noted. Officers clarified that the SPD is a planning document and therefore it can only guide development that requires planning permission and therefore some suggestions were beyond its remit. However, the Council have committed to putting together a webpage which will include links to best practice on a wider range of topics including general maintenance and repair of properties. This will include links to best practice guidance and helpful links regarding the planning process and the pre-application advice service.

Ealing Front Gardens were pleased to see that the Climate Change SPD includes several measures about hard surfaced front gardens and restoring them to green space. In view of the many and wide-ranging problems caused by this practice they welcomed the SPD. However, they outlined the main detrimental effects caused by hard surfacing. Officers noted and welcomed the general support.

The Swifts Network engaged with the SPD consultation and felt that the focus of the document and the topic areas covered were not all relevant to climate change and that there should have been more detail on actual climate change related aspects such as Biodiversity. The network had more specific comments and suggested amendments to other parts of the document. Officers noted the general comments. Officers responded by explaining that many of the topic areas addressed in the SPD are cross cutting and therefore there are already references in different planning documents to them. For example, Biodiversity and air quality are both addressed in

our planning guidance SPD. The Climate Change SPD must be read alongside other policy and guidance documents.

The Earls Court Development and Telereal Trillium were supportive of this SPD; however, they had some more detailed comments and suggested amendments. ECDC were particularly keen to highlight that the language used in the SPD is sometimes loose or ambiguous. Both sought clarity on which targets must be achieved and whether they are guidance or ambitions. The council welcomed the support and officers have responded to the detailed comments. We note the comments made on language and we have made changes to clarify the meaning of some of the key principles, in particular clarification on the reference to Leti Key performance indicators. Officers pinpointed that the 'How to use this SPD' section of the SPD provides an explanation for how the guidance should be interpreted. The SPD cannot introduce new policy or requirements over and above the adopted development plan which dictates how the key principles can be worded. This is why there are 'Must Do' principles and 'Can Do' principles.

Organisations including Transport for London, Woodland Trust, Historic England, the Old Oak and Development Corporation and the Campaign for Rural England welcomed the SPD and gave overall support but made more specific comments to relevant sections of the SPD. Natural England and the Marine Management Organisation engaged in the consultation but didn't make any specific comments.

Interactive Key Intervention diagrams

There were three responses that referred to the interactive summary diagrams. The respondents were Historic England, the Swifts Local Network, and the Old Oak and Park Royal Development Corporation (OPDC).

Historic England noted that it would be helpful for the diagram on page 11 of the consultation document (Retrofitting Homes) to make clear that the repair of windows in buildings in conservation areas should be considered before replacement. The Council support this suggestion and have amended the text as part of the diagram to state that "Where repair of existing windows is unfeasible high-performance windows should be installed."

The Swifts Local Network commented that there was not enough reference in the diagrams regarding building-based biodiversity, with particular reference to bat and bird boxes. We have acknowledged these comments and amended the diagrams to show habitat creation through bat and bird boxes. We note however that it is outside the scope of this SPD to provide detailed information on habitats and habitat creation, and our changes to the document is therefore limited.

The OPDC considered that the Key Intervention diagrams in the document was a "very useful" inclusion, but did not provide detailed comments. This support has been noted.

Retrofitting homes

We received eight separate comments from 6 different respondents- Alison Hancock rep no 45 Dianne Murray rep no 3 Historic England rep 31 Swifts Local Network 41, 42 Sonia Falconieri rep 25, and John Rowles 72 71.

Alison Hancock commented that more than 50% of properties are within a Conservation area which means the council is able to reject any retrofit proposal in a Conservation area. She wanted to see reference to public benefits and a suggested a balance can be struck between preservation and conservation in the SPD. Sonia Falconieri made a similar comment that the SPD is limiting for houses in conservation areas, with emphasis on preservation of character rather than the climate crisis. The council notes these comments but cannot override National Planning Policy which limits the actions that can be taken in Conservation Areas. The Council does encourage upgrades to property in Conservation Areas while ensuring that the is respectful of heritage in the borough.

Dianne Murray commented that noise can be a big problem when opening windows in LBHF - particularly in a courtyard style building which amplifies sound or close to a children's play site. She recommended a publication on planting a wellbeing garden which has a section on planting to absorb sound to help design this in from the outset. We agree about the role of planting in absorbing noise, and we have added more wording to key principles KP 14 and to KP16 regarding the benefits of planting on air quality and noise reduction.

Historic England supported the advice given in this chapter and of the issues and challenges it addresses. More detailed specific advice was suggested to be added including on inappropriate retrofit measures and the importance of ongoing maintenance to energy performance, secondary glazing and window and door repair. We are pleased to see this national heritage body supporting the SPD and retrofitting chapter. We have not made any further changes because we consider that the level of detail suggested in this response goes beyond the remit of this SPD and would be more appropriate to a specific advice note. In response to this comment, and more generally to the responses to this chapter, we want to be clear that the SPD is intended to guide a range of applicants in how best interventions can be made to adapt to and mitigate the effects of climate change and will be supported by a webpage which will include links to best practice and include links to Historic England Guidance where appropriate.

The Swifts Local Network made two representations on this chapter. Detailed comments were made on the impact of energy-efficiency retrofit on buildings-based biodiversity such as bats and red-listed bird species and noted that external Wall Insulation (EWI) can significantly affect buildings-based biodiversity, making reference to their own publication on this matter. A separate comment was on the presence of red-listed house sparrows, and the declining presence of swifts in the

borough, and they made reference to the online RSPB Swift Mapper. As with the representation above, the additional information sought to be added would go beyond the remit of this SPD. The London Plan, the council's Local Plan and Planning Guidance SPD set out policy and key principles on a wide range of environmental matters including biodiversity. It is outside the scope of this SPD to provide detailed information on habitats and habitat creation; however, we agree that in the context of building projects there is merit in reference bat and bird boxes, and bee bricks and we have made changes to the diagrams on pages 11-15. The new webpage will include links to best practice guidance regarding habitat creation where appropriate.

John Rowles pointed out that fully removing chimneys is a very carbon intensive intervention. He wanted to see specific guidance on more modest interventions, and recommended the Historic England guidance on energy efficiency which is applicable to all houses with chimneys. We note these comments and intend to take the suggestions on specialist guidance forward in a supporting webpage. This can help homeowners make informed decisions regarding chimney blocking or removal. Another detailed representation concerned replacement windows; the merits of quality frames suggested a reference is added to Historic England guidance to better inform residents. It is not possible for the Council to control replacement windows outside of a conservation area or in listed buildings where replacement windows are a permitted development right therefore no further changes have been made in respect of this comment.

Net zero Carbon Buildings

Three consultees commented on this Chapter, the Old Oak and Park Royal Development Corporation (OPDC), TfL's Transport Trading Limited Properties Limited and the Earl's Court Development Company (ECDC).

The OPDC and TfL broadly supported and welcomed the issues covered in the Chapter. ECDC raised several queries about the issues covered in the bullet points in this chapter, including seeking clarification on whether or not compliance with the LETI (Low Energy Transformation Initiative) targets was required or not.

In response, we have added a new "Can Do" Key Principle to clarify the approach on the LETI targets and amended references to LETI in Para 2.5.

Building Form and Fabric

Only ECDC made detailed comments on this Chapter. They queried whether or not the achievement of a "net zero energy balance" was a compulsory requirement or not as this was unclear from the wording.

We agreed that an amendment to the text (Paragraph 2.6) would help to clarify that the net zero energy balance is encouraged but not a compulsory target.

Site and Orientation

There was one comment from ECDC regarding the requirements of Key Principle KPC3 and the difficulty in achieving the requirements of the Key Principle given the complexities of the Earl's Court site. We agree and have amended the text to provide further clarity regarding the requirements of the KPC3.

Ventilation and Overheating

Four consultees commented on this Chapter: CPRE London, ECDC, the Ealing Front Gardens Project and John Rowles.

CPRE London raised some issues regarding the use of language and wanted the wording strengthened in places to avoid use of words such as “where possible” or “if possible” and instead of asking developers to “consider” certain measures, make them a requirement. These comments were noted although in response we highlighted that the use of such wording was acceptable in relation to outlining measures suitable for what developers “Can” do rather than what they “Must do”. However, in response to a specific comment about single aspect dwellings, an amendment was proposed to say that these should normally be avoided rather than avoided “if possible” which reflects more closely the wording in the London Plan on this issue.

ECDC raised a query about use of the phrase “insulation which can prevent heat retention” as this is the purpose of insulation. We agreed and re-worded the text to highlight that insulation can be used to prevent heat loss as well prevent overheating.

John Rowles made a point about wanting the guidance on ventilation to deal with communal areas as they can contribute to overheating. We noted that an unintended consequence of higher insulation levels and more stringent air tightness standards for new buildings may be overheating but there is also evidence that these problems can be avoided in a well-designed and well-constructed development. To add context to Paragraph 2.18 regarding ventilation and overheating, some additional text has been included to note that “It is important that use of higher insulation levels and more stringent air tightness standards do not lead to overheating This can be avoided through good design and construction practices”.

Finally, Ealing Front Gardens Project wanted reference to be made to parking surfaces in this section on ventilation and overheating. We assumed this comment related to highlighting how greening of parking spaces can help reduce Urban Heat Island effects and overheating. To promote this, we have added a link to the Royal Horticultural Society's Front Garden Design guide on how to reduce paving and increase planting in this Chapter. Additional text also added to note that soft landscaping/green infrastructure and other features can help reduce heat island

impacts, and use of permeable materials, such as a mix of planting and paving/blocks etc is encouraged.

Renewable Energy and Low Carbon Heating

Two consultees commented on this Chapter – ECDC and Alison Hancock. ECDC requested that the KP7 text clarifies which Building Regulations were being referred to and to define the meaning of “Low Global Warming Potential”. To clarify the requirements with regards to the Global Warming Potential (GWP) of refrigerants used in Heat Pumps, some additional text was added to highlight that use of low GWP refrigerants are preferred (e.g., those with a GWP value of <150). Regarding the query on Building Regulations, the 2021 Regulations are now the relevant ones, not 2013, so this has been clarified in the text.

Alison Hancock highlighted the low uptake of solar power installations in the borough and said that the planning process is a key factor in this poor performance. We noted that the council’s planning policies and associated guidance, including the Climate Change SPD all aim to increase use of renewables including solar panels on new/existing buildings, especially major schemes. The council has also used schemes such as “Solar Together” to help residents install PV and battery storage systems and we provide free pre-planning advice to residents interested in getting solar panels installed. No specific changes were made in response to this comment.

Embodied Carbon

There was one detailed comment on this chapter from the Earls Court Development Corporation. Two consultees referenced the content of the chapter when commenting on other parts of the SPD. These include the Earl’s Court Development Company (ECDC) and Telereal Trillium. These comments and the Council’s response is detailed under General, Net Zero Carbon Buildings, Case Studies, and Checklist and Glossary.

Earls Court Development Corporation queried why LETI embodied carbon targets are listed in Figure 3 of the Net Zero Carbon Buildings chapter but are not referred to in the Embodied Carbon Key Principle. There were also concerns raised that the requirements to use some sustainable resources are unviable due to the nature of some developments, in particular tall buildings.

In response, the Council have inserted a new paragraph 2.28 to reference the LETI embodied carbon targets set out in Figure 3 and reference to the LETI Carbon Primer document for further information. A new point has also been added to the Key Principle (KPC9) noted that developments should aspire to the GLAs Whole Lifecycle Carbon benchmarks and/or LETI embodied carbon emission targets as set out in Figure 3.

Water efficiency

We received only one comment on this chapter, ECDC sought clarification on some of the wording in KP9 regarding the footnote reference and on achieving maximum water credits. We agree and have amended the text to avoid any ambiguity.

Transport and movement

We received many representations including supporting comments on this chapter. A total of twelve comments were made from Dianne Murray, the OPDC, TTL Properties Ltd, Transport for London (TfL), CPRE London, ECDC, John Rowles, Hammersmith BID, the Woodland Trust and Ealing Front Gardens Project (EFGP).

We are pleased that most of those commenting were supportive of this chapter, namely the OPDC, TTL Properties Ltd, John Rowles, Hammersmith BID, and The Woodland Trust.

A number of respondents wanted to see more details added: TTL Properties Ltd - maximising site capacity; John Rowles sought advice on front gardens and parking; the Woodland Trust recommended stating a preference for UK & Ireland sourced & grown treestock, Ealing Front Garden Project suggested adding size and planting specifications for front garden parking areas, relating to KP12. We note these suggestions, however we have not made any further changes as suggested because we need to make sure that the scope is relevant to a supplementary planning guidance document; and we intend to provide a more much detailed supportive website which can host documents as suggested by the responses. Maximising site capacity is already covered by policy (Local Plan Policy T1); the details sought by John Rowles and Ealing Front Gardens Project's suggestions fall beyond the scope for the planning system to control front gardens. This SPD does contain best practice principles on this subject. There is a link in KP16 to the Royal Horticultural Society's webpages which have information on planting for climate change resilience, and information on native tree species. In addition, the council's Climate Change and Ecology Strategy and Action Plan does contain commitments towards native species, and in Parks Management Strategies. ECDC also had a query on assessment of Healthy Street principles. Generally, the levels of detail sought are more appropriate to be hosted on our website.

Dianne Murray was concerned about secure bike parking on council estates. This matter is beyond the remit of planning guidance, however it is addressed in the SPD which advocates secure cycle parking and refers to cycle standards in KP11. There was a suggestion from John Rowles for new section covering how flats can make adaptations for climate change. No changes are proposed as the SPD is applicable to flats for adaptations that can be achieved externally and are subject to planning control.

CPRE wanted KP11 to reference how public kerbside space can deliver 'high-quality public realm', and more clarification on mitigating negative impacts. We have not proposed any changes because in practice a balance needs to be struck on competing demands, taking into account operational requirements and site-specific priorities, and KP11 references London Plan policy which acknowledges that mitigation may not always be possible.

We have made some minor changes to KP11 and to better align the wording in KP11 to the London Plan approach in response to TfL comments. These include removing reference to Active Travel Strategy and adding reference to Active Travel Zone (ATZ) Assessment. Reference to London Plan policy and TfL Guidance on Transport Assessment and Travel Plans have also been added. We have moved 2 bullet points on providing facilities to encourage cycling and on EV charging points from KP12 to KP11 as these are requirements.

Air quality

We received six comments on this chapter from the OPDC, TTL Properties Ltd, TfL and the GLA.

The representations cover a wide variety of matters concerning the broader air quality topic: exposure to poor air quality, retention of trees, sustainable travel choices, and use of solid fuels for heating in a new development. The OPDC and TTL Properties Ltd were supportive of the Air Quality Key Principles, however both sought more detail within the SPD. The OPDC looked for more guidance around development and sensitive uses/ users, whilst TTL properties caveated their comments that retention of trees should be based on an arboricultural assessment. In both cases, no changes are proposed as we consider the SPD should be a concise document however further detailed information and guidance will be provided on the council's website. TfL suggested that key principles KP11 and KP12 should be more comprehensive by referring to TfL's Transport and Movement requirements. We consider this comment is addressed in the supporting paragraph which does in fact make reference to the sustainable travel requirements in the London Plan. The GLA's comments related to the cross-cutting nature of air quality policies and London Plan and Local Plan policies promoting a shift from private vehicle to sustainable travel choices is noted and we agree that providing secure cycle storage can encourage cycling and active travel. We acknowledge that air quality is a cross-cutting theme and to reflect the strategic objectives referred to by TfL, the bullet point on cycle provision in KP12 (What you 'can do') has been moved to KP11 as a 'Must Do' requirement. The comment that stove burners are a significant contributor to poor quality is not disputed, however their installation cannot be controlled by the planning system. Similarly, whilst there is no dispute that the use of solid fuels for primary or secondary heating in a new development will mean it is not Air Quality Neutral, we consider this level of detail is not appropriate for this SPD, the council's website does have very detailed webpages dedicated to air

quality matters. It is noted that London Plan policy is already in place to secure air quality neutral development and does not need to be repeated in this SPD. The GLA suggested we add more detail to Key Principle 14 on choosing an appropriate species, on the size, location and density of planting. We acknowledge that Air Quality actions can take a number of forms including greening measures, however we consider that the changes sought are already adequately covered in the Ecology Biodiversity and Green Infrastructure chapter. The actions listed in KP14 are optional actions extending beyond policy requirements and are not intended to be exhaustive. We consider that the level of detail requested is outside the remit of a planning guidance documents, however supporting information and useful links, such as to the RHS advice, will be provided on our website.

Ecology, Biodiversity and Green Infrastructure

We received seven comments from the following organisations in relation to this chapter from the OPDC Ealing Front Gardens Project (EFGP), the Swifts Local Network and ECDC.

The OPDC confirmed support for the SPD's acknowledgment of the vital role of green infrastructure and nature recovery to mitigate the impacts of climate change and to contribute to biodiversity maintenance.

The Ealing Front Gardens Project (EFGP) commented about the inadequacy of permeable paving in front gardens and pointed out the problems caused by poor maintenance of impermeable and permeable hard surfaces. EFGP wanted to see more detail about why certain types of hard surfacing is undesirable, and also to promote matrix paving. We do acknowledge the importance of maintenance; however, the aim of the SPD is to promote best practice in a concise document, rather than to provide an exhaustive list of products and measures to mitigate the effects of climate change. It is intended that further practical information and advice will be provided on the council's website. We do agree however that this section can benefit from additional wording can improve this section, so more text has been added to refer to RHS advice, and more text to link key principles dealing with Transport KP12 and Greening (KP16).

The Swifts Local Network sought to widen the remit of the SPD, rename it 'Environment SPD', and queried the SPD's interpretation of Biodiversity Net Gain (BNG). Reference to 'species features' such as swift bricks, bat boxes and hedgehog highways was sought. It was felt that SPD references to green and blue infrastructure and the Urban Greening Factor (UDF) did not provide a holistic consideration of biodiversity, ignoring the features necessary for wildlife, and pointed out that integrated swift bricks are much better than external nest boxes. In response, we consider the scope and title of the SPD is appropriate to its purpose of explaining how development can respond to climate change. The SPD has been written to support local and London Plan policy objectives, and also goes further to

encourage best practice for householders and businesses. Whilst the Planning Guidance SPD already covers biodiversity including birds, we agree that some additional wording referring to bat and bird boxes, and bee bricks will be beneficial in the context of considering new building projects and have added to the text.

The Swifts Local Network were concerned that there is no reference to the main impact of retrofit for energy-efficiency - loss of nest and roost sites, due to building work. Because this SPD should be read alongside other planning documents with detailed guidance on biodiversity including our Planning Guidance SPD, we do not consider that more detail is necessary.

The Ealing Front Gardens Project sought a change to KP16 regarding replacing impervious hardstanding with more detailed wording. However, as this it is not intended to provide an exhaustive list, no changes have been made as a result of this comment. This group also wanted to see Image 13 (page 37) replaced with an image showing matrix paving. However, we have decided to remove this image entirely as there are a number of alternative solutions to providing front garden parking in biodiversity-friendly ways.

The ECDC (Earls Court Development Company) commented on Key Principle 15 regarding whether the language regarding “aim to exceed” the Urban Greening Factor score is ambiguous. We agree that the wording would benefit from some clarification better reflecting the London Plan and changes have been made to clarify that major development proposals will need to align with London Plan policy G5.

Flooding and Sustainable Drainage

Four consultees commented on this Chapter: the OPDC, ECDC, Ealing Front Gardens Project and Richard Jackson.

The OPDC expressed support for our approach to managing risks of surface water and sewer flooding. This support was welcomed, and no amendments were required.

Richard Jackson suggested a “new planning requirement” relating to rainwater being directed into a soakaway where properties are extended. We agree that soakaways can be suitable for some sites, subject to Building Regulations requirements, but do not consider the SPD could set a specific requirement for their inclusion as we cannot introduce new policies. However, we have made an amendment to Paragraph 2.53 to specifically highlight that soakaways can be an option to manage surface water where there are suitable soils etc.

The Ealing Front Gardens Project asked for more of a distinction between different hard landscaped surfaces such as front drives for car parking and patios and how they could be made permeable using different approaches. This comment was mainly dealt with by including a link in Paragraph 2.53 and Key Principles 12 and 16 to the Royal Horticultural Society’s guidance on designing front gardens which

provides useful information on how to integrate soft landscaping and minimise hard surfaces in front garden spaces.

ECDC asked for further information on what was meant by “sufficient information on risk and mitigation measures” with regards to Flood Risk Assessment requirements (as referenced in KP18). This has been clarified in a minor amendment to the wording of the relevant text in KP18.

Sustainable Waste Management

Comments were only received on this chapter from the OPDC. The comments were supportive of the contents of the chapter.

Heritage and Conservation

We received 3 representations on this chapter from Michael Pritchett and Historic England.

Michael Pritchett was concerned about there being too many obstacles preventing changes to properties in conservation areas to respond to the effects of climate change and suggested that decision on home improvements balance between destruction caused by the emergency and the damage caused by heritage. We note the comments made and have attempted to clarify for householders the types of climate change adaptation that can be made with or without planning permission. Permitted development rules are set out by the Government nationally. The council is also bound by law that means we have a duty to protect heritage assets, and this includes the extra level of care that needs to be made in considering measures to combat climate change. When granting permission for climate-based adaptations officers do consider a range of factors such as the level of harm to a conservation area or listed building, caused by the proposal balanced against the benefit to be gained.

Historic England wanted to see stronger wording in a number of areas, mainly concerning retrofit measures on-going maintenance and small-scale changes to a heritage asset. We understand the intention behind the suggested changes however we do not agree that the changes and level of detail sought are appropriate the remit of this SPD, which is not an advice guide. The Council is putting together a webpage which will include sources of further information, including links to Historic England Guidance where appropriate.

Historic England also suggested changes to Table 1 and related diagram which set out a number of climate change adaptations to properties including those in conservation areas. They proposed that the table and diagram make it clear that there is a preference for repairs to windows in conservation areas over replacement, and that Table 1 is clearer about the disbenefits of uPVC windows. The Council does promote the use of sustainable materials where possible, and this is explicitly encouraged in the embodied carbon chapter of the document. Best practice on a

wider range of topics including general maintenance and repair will be set out on a supporting webpage which will include helpful links. We have added some wording to the diagram to make it clear that repair of windows is prioritised over replacement.

Case studies

Five consultees commented on this Chapter, the Earl's Court Development Company (ECDC), Dianne Murray, TTL Properties Ltd, Sonia Falconieri and Alison Hancock.

The ECDC raised a few queries about the “embodied carbon ambitions and achievement of LETI targets” concerning the following three case studies: Hartopp and Lannoy Point, Swindon Cultural Quarter development and The Forge, Southwark. The comments were welcomed; however, no amendments were required considering that for the purpose of the Supplementary Planning Document, the case studies have been designed to provide inspiration for residents and developers and have not been selected as the most favourable scenarios.

Dianne Murray proposed to include more social housing examples or visuals in the document as well as examples of greening tall buildings. The comment was welcomed, social housing examples and visuals were already provided in the supplementary planning document.

Sonia Falconieri made a general comment about the inappropriateness of the case studies in this section stating that “they do not provide any details on the projects, nor details about their implementation and costs.”

TTL Properties and Alison Hancock suggested to include local case studies in the section which would be useful to showcase best practice within the borough.

In response to the above observations, we have amended the case studies section focussing on more local examples where possible.

Checklist and Glossary

Energy Efficiency - ECDC queried whether the “KPIs” referred to in the “Energy Efficiency” Checklist were the LETI KPIs. This is the case, so the text has been revised slightly to clarify this.

Ecology, Biodiversity and Green Infrastructure – ECDC queried whether the minimum UGF referenced in KP15 referred to a target or it was an ambition. This comment was noted and no amendments were required. In response, it was clarified that KP15 refers to the London Plan policy G5 that sets up principles for applying and calculating the UGF.

Embodied Carbon - ECDC asked whether or not there were specific Embodied Carbon targets that should be met as this is not mentioned in the checklist. This

comment was noted and the text revised to refer to meeting the LETI embodied energy targets where possible.

Transport and Movement – TfL suggested a minor change to the wording of the text in the fourth point of the 'Transport and Movement' checklist. This comment was agreed, and the text revised accordingly.

Appendices

Appendix 1: Letter/email sent to Consultees

Appendix 2: Public Notice

Appendix 3: List of people consulted

Appendix 1: Letter/email sent to consultees

Copy of letter/email sent to statutory consultees, local residents, amenity groups & developers/agents

London Borough of Hammersmith & Fulham
Spatial Planning, Economy Department
3 Shortlands, Hammersmith, W6
Tel: 020 8753 1081
Email: localplan@lbhf.gov.uk
Web: www.lbhf.gov.uk/localplan



20th April 2023

Dear Sir/Madam,

We are just writing to let you know that Hammersmith and Fulham Council is consulting on a Climate Change Supplementary Planning Document.

This document will be out for public consultation for 7 weeks between 20th April and 8th June 2023. The purpose of the SPD is to provide supplementary guidance to the planning policies contained in the council's Local Plan that relate to climate change and to help implement the actions contained in the council's climate change strategy. The guidance in this SPD applies to new build homes, extensions and retrofitting of homes, non-domestic and mixed-use developments.

Have your [say](#)

We welcome any comments you may have on this draft SPD during this 7-week consultation period. (See [Public Notice](#) for more details).

You'll find the documents online at:

[Have your say on our Climate Change Supplementary Planning Document | LBHF](#)

The SPD can be viewed on the council's website, or you can read it at one of our three main libraries (Hammersmith, [Fulham](#) and Shepherd's Bush).

Let us know what you think by 11:59pm on Thursday 8th June 2023.

To comment on any of the three documents please write to us using one of the following:

- **Email:** localplan@lbhf.gov.uk
- **Letter:** Team Leader, Policy and Spatial Planning Team, Economy Department, 1st Floor, 3 Shortlands, Hammersmith, W6 6DA

If you require further information, please contact us at localplan@lbhf.gov.uk. We look forward to hearing from you.

Yours sincerely

David Gawthorpe
Team Leader, Policy & Spatial Planning

Copy of letter/email sent to Statutory SEA Consultees (Environment Agency, Historic England & Natural England)

London Borough of Hammersmith & Fulham
Spatial Planning, Economy Department
3 Shortlands, Hammersmith W8

Email: localplan@lbhf.gov.uk
Web: www.lbhf.gov.uk/localplan



20th April 2023

Dear Sir/Madam,

We are consulting you in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 in connection with the preparation of a **Climate Change Supplementary Planning Document (SPD)** for the London Borough of Hammersmith & Fulham:

Before determining whether or not the SPD is likely to have significant environmental effects and therefore whether a Strategic Environmental Assessment (SEA) is required, the Council is consulting your organisation.

The objectives of the SPD, once it is finalised, will be to:

- establish detailed guidance on the application of policies within the Local Plan that are concerned with climate change
- assist applicants to make successful planning applications.

The SPD is being consulted on until 8th June – [Have your say on our Climate Change Supplementary Planning Document | LBHF](#)

The Council has considered the requirements of the Regulations, and specifically Schedule I (the criteria for determining the likely significance of the effects on the environment). After undertaking a draft screening assessment ([click here for Screening assessment](#)), the Council's preliminary view is that the SPD is not likely to have significant environmental effects, and therefore an SEA is not required in this instance.

Please let me know if you have any queries in connection with the above. If you consider that there is a need for an SEA, I would be grateful if you could contact me as soon as possible.

Yours sincerely

David Gawthorpe
Team Leader, Policy & Spatial Planning

Appendix 2: Copy of Public Notice sent to consultees & published on the Council's website

Public Notice inviting representations on the Climate Change Supplementary Planning Documents (SPD)

Planning and Compulsory Purchase Act 2004 Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation

Notice is hereby given that the London Borough of Hammersmith and Fulham has published two draft SPDs and is inviting representations pursuant to Regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

(a) Title of Document:

Climate Change Supplementary Planning Document (SPD)

(b) Subject Matter of, and the area covered by, the SPD:

The SPD will support the Local Plan which was adopted in February 2018. Its purpose is to provide supplementary guidance on the Local Plan policies the council will apply when considering planning applications for development proposals relating to Climate Change and retrofitting.

(c) Date by which representations must be made:

11:59pm Thursday 8 June 2023

(d) Address to which representations must be sent:

Representations may be made either in writing or by email as set out below.

- Email to: localplan@lbhf.gov.uk
- By post to: Team Leader, Policy and Spatial Planning, Economy Department, London Borough of Hammersmith and Fulham, 1st Floor, 3 Shortlands, Hammersmith, London, W6 6DA.

(e) Documents are available for inspection

The SPD and associated documents are available for inspection online at:

www.lbhf.gov.uk/localplan

In hard copy format during normal office hours at:

- Fulham Library which is situated at 598 Fulham Road 10am to 7 pm Monday to Thursday, 10am to 5pm Friday and Saturday and 11am to 5pm Sunday;
- Hammersmith Library which is situated in Shepherds Bush Road 10am to 7 pm Monday to Thursday, 10am to 5pm Friday and Saturday.
- Shepherds Bush Library which is situated at 6 Wood Lane 10am to 7pm Monday to Friday, 10am to 5pm Saturday and 11am to 5pm Sunday.

For further enquiries, please email localplan@lbhf.gov.uk

(f) Statement of notification

Any representations may be accompanied by a request to be notified at a specified email or postal address of the adoption of the SPD.

Appendix 3: List of people consulted on the Climate Change SPD

Statutory Consultees

Canal & River Trust
City of London Corporation
Civil Aviation Authority
Environment Agency (London Team)
Greater London Authority
Hammersmith and Fulham Health and Wellbeing Board (H&WB)
Highways England
Historic England
Homes England
Imperial College Healthcare NHS Trust
Imperial College London
London Borough of Barking and Dagenham
London Borough of Barnet
London Borough of Bexley
London Borough of Brent
London Borough of Bromley
London Borough of Camden
London Borough of Croydon
London Borough of Ealing
London Borough of Enfield
London Borough of Greenwich
London Borough of Hackney
London Borough of Haringey
London Borough of Harrow
London Borough of Havering
London Borough of Hillingdon
London Borough of Hounslow
London Borough of Islington
London Borough of Lambeth
London Borough of Lewisham
London Borough of Merton
London Borough of Newham

London Borough of Redbridge
London Borough of Richmond-upon-Thames
London Borough of Southwark
London Borough of Sutton
London Borough of Tower Hamlets
London Borough of Waltham Forest
London Borough of Wandsworth
London Port Health Authority
Marine Management Organisation
Metropolitan Police Service
Department for Levelling up, Housing and Communities
National Grid
Natural England
Network Rail Property
Networks Branch - London
NHS Property Services
North London Waste Plan
Office of Rail Regulation
OPDC
Port of London Authority
Royal Borough of Kensington & Chelsea
Royal Borough of Kingston Upon Thames
Sport England
Thames Water Property Services
The Coal Authority
The Planning Inspectorate
Transport for London
Transport for London Commercial Development
Transport for London Planning and Construction
Western Riverside Waste Authority
Westminster City Council

Planning Agents & Developers

AECOM
Alsop Verrill LLP
Amec Foster Wheeler
Architects Muroblanco LTD
Asp Architects London Ltd
Barton Willmore
Boyer Planning
Carter Jonas LLP
CBRE
CgMs Consulting
Chase and Partners
Citydesigner
CMA Planning Ltd
Colliers International
Cushman & Wakefield LLP
Deloitte
Development Planning Partnership
Dlp Consulting
DP9
Dron and Wright Property Consultants
Entec UK Ltd
ESA Planning
GL Hearn
GVA
Home Builders Federation
HTA Design LLP
ICENI Projects
Indigo Planning
Jones Lang La Salle
Kirkwell
Knight Developments Ltd
Knight Frank
Lambert Smith Hampton
Legal & General Property
London First
Maddox & Associates
Matthew & Son LLP
Montagu-Evans

Muroblanco LTD
Nathaniel Lichfield and Partners
Peacock & Smith
Planning Perspectives
Planning Potential
Planview
Planware Ltd
PowerHaus Consultancy
Quinata Property Group
Quod
Rapleys LLP
Ransome & Company
rg+p Ltd
Rolfe Judd Planning
RPS Planning
Savills
Shire Consulting
South East Waste Planning Advisory Group
SSA Planning
Strutt & Parker
Tesni Properties
Tetlow King Planning
TP Bennett
Turley Associates
U V ARCHITECTS
West & Partners
Wildstone Planning
Montagu-Evans
CBRE
Tetlow King Planning
Lambert Smith Hampton
Strutt & Parker
CBRE
Planview
Savills
Montagu- Evans
Daniel Watney
Gerald Eve

General Consultees

Arcus Consulting
Safeguarding Planning Manager HS2 Ltd
Alumno Developments Ltd
Fulham Black Community Association
Greek Orthodox Church of St Nicholas
Barn Elms Rowing Club
St Aidan's East Acton RC Church
Advance Advocacy & NCH Violence Community Education
Christ Church
Ethiopian Christian Fellowship Church
Outside Edge Theatre Company
Fulham Primary Play Centre
Friends of Kenmont Primary School
London Corinthian Sailing Club
London Bubble Theatre Company
New Testament Church of God
The Phoenix Canberra Schools Federation
Polish Cultural Centre
POSK Polish Social & Cultural
Standing Together Against Domestic Violence
St Johns & St James Church
St Peter's Primary School
Holy Innocents
St Lukes Church
Hammersmith & Fulham Citizens Advice Bureau
Hammersmith & Fulham Skills Centre
Gateway Clubs (Mencap H&F)
Peabody - Old Oak Housing Association
The Boisot Waters Cohen Partnership
The Asian Health Agency
Burlington Danes School
Renewable Energy Association
Parents & Staff Association (PSA)
Holy Trinity
Business Centre- Hammersmith and Fulham
Campaign for Real Ale
Canalside Activity Centre
Broadway Shopping Centre
Friends of Bishops Park
St Paul's Church Hammersmith
St Charles Centre for Health and Welbeing
Dr Edwards & Bishop Kings Fulham Charity
Diocese of London

Shepherds Bush Housing Group
Queens Park Rangers Over 60's Club
Townmead Youth Club
Ecologic Architects
Osborne Richardson
Catalyst Housing
British Red Cross Society- London Branch
The Consumers Association- Which?
NHS Property Services Ltd. (NHS PS)
Furnish / Staying First Community Store
St George plc
London United Busways Ltd
Sir John Lillie Play Centre
Masbro Brook Green Family Centre
Cluttons LLP
Department for Environment Food & Rural Affairs
Age UK Hammersmith and Fulham
Ministry of Defence
DPDS Consulting
Domestic Violence Intervention Project (DVIP)
British Geological Survey
Department for Business, Innovation and Skills
BREEAM Department
Confederation of British Industry London Region
Considerate Constructors Scheme
Construction Industry Council
CIRIA
Cityscape Digital
Department for Culture, Media & Sports
Greek Cypriot Association
Fulham Football Club Ltd
Harper Collins Publishers
Hammersmith & Fulham Mind
H&F Volunteer Centre
LAMDA
Lyric Theatre
Parvez & Co
Rogers Stirk Harbour & Partners
Sons of the Thames Rowing Club
London Wildlife Trust
Workspace Group plc
Eric Parry Architects
Ealing Somali Welfare and Cultural Association

Rapleys LLP
Central and North West London NHS Foundation Trust Community Services
North London Waste Plan
Friends Families and Travellers- Planning
Fulham Court Community Group
Fulham Football in the Community
Fulham Archaeological Rescue Group
Fulham Palace Meadows Allotment Association
Our Lady of Dolours
Imperial College London
Central Gurdwara (Khalsa jatha) Sikh Temple
NOMS - Ministry of Justice
Hammersmith & Fulham Rugby Football Club
London Fire Brigade
Countryside Properties
Novotel Hotel
Hotel Ibis
St Augustine's Catholic Church
Chelsea Harbour Marina
Home Builders Federation
The Food Standards Agency
Community Law Centre
Open Spaces Society
High Speed Two (HS2) Limited
HUDU - Healthy Urban Development Unit
NHS London Healthy Urban Development Unit
Friends of Hammersmith Hospital
Fulham Seventh-day Adventist Church
African Caribbean Women's Development
Action on Disability
Assael Architecture Limited
Ballymore Properties Ltd.
Bharatiya Vidya Bhavan - Institute of Indian Art & Culture
British Property Federation
British Retail Consortium
Brett Group
British Rowing
Burleigh College
Bush Theatre
Byrne Estates
Centre for Armenian Information & Advice (CAIA)
Princes Royal Trust
Charing Cross Sports Club

Communities Empowerment Network
Chiswick Seventh Day Adventist Church
Community Links
Campaign to Protect Rural England
AASHA
Bishop Creighton House- Care and Repair
Bishop Creighton House Settlement
Community Education Forum
Small Jobs Scheme
Somali Children's Advocacy
London Cyrenians Housing
deafPLUS
Disabled Living Foundation
Ecole Francaise de Londres
Hammersmith Eventim Apollo
First Plan
Fit Rooms Ltd
Friends of Wormwood Scrubs
Fulham United Reform Church
Goldcrest Homes
Hammersmith London BID
Hammersmith United Charities
Harrow Club
Home Builders Federation
Heritage of London Trust
Hogarth Architects
Derek Horne & Associates
Horn of Africa
National Housing Federation
Icon Architects
Industry Council for Packaging & The Environment
Landmark Information Group Ltd
Living Streets
London Councils
London Play
Lawn Tennis Association
The Lawn Tennis Association
Friends of Margravine Cemetery
The Mayhew Animal Home
Mobile Operators Association
Mount Anvil Ltd
St Mungo's Broadway
Murphy Dave Architects
Muscular Dystrophy Campaign
Hammersmith Hospitals NHS Trust
Retirement Fellowship Group

Octavia Housing
White City Adventure Playground Support
Pocket Living Limited
Puffins Nursery School
QPR 1st Supporters Trust
Renewable Power Association
SPEAR- Resurgo Trust
River House Trust
Rivermead Court Limited
Hammersmith Salvation Army
Sickle Cell Society (H&F)
Southern Planning Practice Ltd
SSA Planning
Sir Oswald Stoll Foundation
St Peter's Church
St Simon's Church
Taylor Woodrow Prop Co Ltd
The Conservation Volunteers
Tetlow King Planning
Association for the Conservation of Energy
Brunswick Club
The Christian Community Church
Comer Homes
Traveller Law Reform Projection
Twynholme Baptist Church
Unite Group Plc
The Urban Partnership
Urban Intelligence Ltd
Virtual Engine
West London Business
Women & Girls Network
William Morris Society
Al Muntada Al Islami Trust
The William Morris Academy
Women's Pioneer Housing
Hammersmith & Ealing Woodcraft Folk
Yarrow Housing
CITAS (Community Interpreting Translation and Access Service)
Inland Waterways Association
Edward Woods Youth Club
ZSL London Zoo
Mentoring Project
Cedar Lodge Sheltered Housing
Federation of Small Businesses
Kensington Hotel

Kim Wilkie and Associates
Hammersmith & Fulham London Cycling Campaign
Queens Park Rangers
London Buddhist Vihara
Arup Planning Consultants
Foster and Partners
Groundwork London
Howard Sharp and Partners
Michael Barclay Partnerhip LLP
Planning Potential
PRP Architects
St William Homes LLP
Cara Trust
Charlick & Nicholson Architects
David Lock Associates
Every Nation London
Fulham Palace Trust - Museum of Fulham Palace
Shepherds Bush Empire
Shepherds Bush Families Project
Hurlingham Club
Hurlingham Park Bowls Club
Foundations UK
The Crown Estate Commissioners
Hammersmith & Fulham Chamber of Commerce (now part of LCCI)
Westcity Holdings Ltd
PowerHaus Consultancy
National Deaf Children's Society
Bellway Homes North London
Big Yellow Self Storage Company Ltd
Normand Park Bowling Club
Deloitte Real Estate
Barker Parry Town Planning
The Georgian Group
Hammersmith Conservative Association
London Historic Parks & Garden Trust
Friends of Queensmill School
Rivercourt Methodist Church
The Serbian Society
St Mary's Friendly Group
St Stephen's & St Thomas'
St Stephen's with St Thomas Social Club
Women's Trust
GoverNment Property Unit
Riverside Artists

Sisterhood & Brotherhood
Royal Yachting Association - Oxford Sail Training Trust
Paul Dickenson and Associates
CBRE
Polish Educational Society
The Bell Cornwell LLP
Natural History Museum
Patel Taylor Architects
London Diocesan Fund
The Diocese of London
BT Group Public Affairs
Conrad International Hotel London
Wyndham Grand London
Westfield Europe Ltd
Woodland Trust
Fulham Somali Women's Association
Fairview New Homes Ltd
Real Flame
Education Funding Agency
Lambert Smith Hampton
Shepherds Bush Road Methodist Church

St Saviours with St Mary's
CAMOC museums of cities
Daisy Trust
Barons Court Project
Asian Elderly Group (Shanti Day Centre)
Shanti Day Centre
Holy Ghost & St Stephen
Somali Community Support Centre
London Underground
Our Lady (of Peperual Help)
St Katherine's Church
St Katherines Youth & Community Centre
Jones Day
Theatres Trust
DB Schenker Rail UK
St Andrew's Church
St Clement's & St Etheldreda's Church
L'Oreal
West & North West London Vietnamese Association
Royal Mail Properties & facilities solutions
Education Funding Agency

Local Residents & Tenants Associations

Ashchurch Residents Association
Avonmore Residents' Association
Barons Court Garden Triangle
Brackenbury Residents Association
Brickfields Area Residents Association
Brook Green Residents Association
Cambridge Grove & Leamore Street Residents Association
Cathnor Park Area Action Group
Charecroft Estate Tenants and Residents Association
College Court Residents Association
Crabtree Estate Residents' Association
Digby Mansions Residents Association
Friends of Furnivall Gardens
Friends of Ravenscourt Park
Fitzgeorge Avenue Leaseholders Association
Fulham Reach
Fulham Society
Hammersmith & Fulham Historic Buildings Group
Hammersmith Embankment Residents Association
Hammersmith Society

Hammersmith Mall Residents Association (HAMRA)
Kensington Society
King Henry's Reach Residents' Association
Loftus Road Residents Amenities Protection Association
Macfarlane Rd and Hopgood St Residents' Association
Peterborough Road and Area Residents' Association (PRARA)
P C Fulham Managements Ltd
Parkview Court
Ravenscourt Action Group
Ravenscourt Society
Sinclair, Milson & Hofland Roads' Residents' Association
Stamford Brook Residents Association
St Peter's Planning concern
St. Peter's Residents Association
St Quintin and Woodlands Neighbourhood Forum
Westcroft Square Residents association
Woodlands Area Residents Including info for: White City Opportunity Area and Old Oak ward.

Independent residents, in particular on behalf of Beavor Lane, Chambon Place, Aiten Place, Theresa Rd and St Peters Rd

Climate Change contacts

Resident Commissioner
Resident Architect
Brackenbury Residents Association
Imagine 2030
West Brompton Residents Association
Engie
Charing Cross Hospital
Build Upon 2 Resident